

E
X
H
I
B
I
T

B



JONATHAN D. GRUNBERG

Direct: 404.445.8363
jgrunberg@wgwlawfirm.com

March 3, 2023

VIA U.S. & ELECTRONIC MAIL

William J. Pulte
c/o Jason Gordon
Law Offices of Jason Gordon, P.A.
3440 Hollywood Blvd., Suite 415
Hollywood, Florida 33021
jg@jgordonlegal.com

RE: Defamation of Brandon Jones and Demand for Retraction

Dear Mr. Pulte:

This law firm has been retained by Brandon Jones to pursue legal redress for your false and defamatory accusations against Mr. Jones via media statements, media interviews, press statements, your website dedicated to your lawsuit against Mr. Jones, and your millions of social media followers. For instance, in more than seventy-five (75) discrete publications, you have falsely accused Mr. Jones of criminal stalking and harassment (of you and your family), theft (from Pulte Homes and its shareholders), and SEC violations (by, *e.g.*, use of almost entirely unstated but purported confidential company information). You did so with knowledge of falsity and a reckless disregard for the truth, and for the openly stated purpose of inflicting maximum reputational and financial damages. To afford you an opportunity to mitigate the substantial harm you have caused to Mr. Jones, we hereby demand that you immediately retract the false and defamatory statements identified herein in as conspicuous a manner as they were originally published.

Due to the number and breadth of your false accusations, this correspondence is lengthy enough without any detailed explanation of the law. For limited factual background, after going to Mr. Jones's employer with certain of your accusations, you filed suit against him in December 2022 for alleged defamation and alleged tortious interference. Your lawsuit is on its face a public relations statement about your alleged role in saving a company in which you no longer hold any position or, according to media reports, any stock. And your lawsuit is littered with wholly irrelevant, self-serving factual allegations and false and defamatory accusations against Mr. Jones. Since filing your lawsuit and to ensure it achieved its maximum desired effect—destruction of Mr. Jones's reputation and career—you have gone to unusual lengths to publicize your false and defamatory accusations. You started a website where you publish your allegations and solicit so-called whistleblower evidence. You sought out media attention. You used various television and podcast interviews about otherwise legitimate topics to stump for your allegations against Mr. Jones. You have used multiple Twitter profiles to prop up your allegations, your website, and your media statements, while incessantly attacking Mr. Jones to your 3+ Million followers. Through



Bill Pulte
c/o Jason Gordon
March 3, 2023
Page 2 of 42

your efforts, you successfully achieved one stated goal of seeing Mr. Jones terminated from PulteGroup.

Through both discrete statements and the juxtaposition of other defamatory statements during media interviews, on your own website, and your Twitter profiles, you conveyed the false and defamatory meaning that Mr. Jones has engaged in criminal, dishonest, unethical, and immoral conduct, all in connection with his profession, which you additionally and falsely assert he is unqualified to perform.¹ Each of your statements identified below must be retracted.

I. Your Media Appearances

On or about December 14, 2022, you appeared for an interview on CNBC.² During your CNBC appearance, you made the following comments conveying a false and defamatory meaning:

This guy's the number 2 now in the company, he's running this bot campaign as far as we can tell ok and we've got pretty good forensic proof on this, which is gonna be proven out in the suit...[Jones is] incessantly [waging a twitter bot campaign against me and my grandfather as well as other members of the Pulte Family].... This is the type of conduct that is not appropriate for an executive.

On or about December 27, 2022, you made an appearance on Anthony Pompliano's podcast in an episode entitled "Bill Pulte on Twitter, Elon Musk, Bot Farms & Bitcoin."³ During this appearance, you made the following comments conveying a false and defamatory meaning:

- "Basically the number 2 in this Fortune 500 company was running these different identities to attack me, attack my dead grandfather, attack my family members.... But when you have in this case a guy taking a dead guy's identity and repurposing it for these twitter bots, for example, and then having these AI generated photos ... and they're all attacking and amplifying each other. And what's really interesting about it is that we saw a lot of nonpublic confidential information coming from these different accounts, these fictitious accounts, and so ... I was able to pick up on ... that's not information that's out there in the public domain, this is potentially a problem. And so it started to get smart with it ... we uncovered it."

¹ The gist conveyed by your many and varied publications will be assessed in its full and complete context. This letter is not exhaustive of every statement or comment you have made that may work together to convey a defamatory meaning regarding Mr. Jones but, rather, demands retraction of the specific communications or portions thereof which, in context, implicate Mr. Jones in criminal, dishonest, unethical, and/or immoral conduct in connection with his trade.

² See <https://www.cnbc.com/video/2022/12/15/zoning-is-a-bigger-headwind-to-housing-than-inventory-says-pulte-capital-ceo-bill-pulte.html>. Additionally, as with all or nearly all articles and interviews referenced herein, this interview may also be found on your Twitter profile where you amplified it as discussed below.

³ See <https://www.youtube.com/watch?v=FqO3YESpLKo&t=733s>.



Bill Pulte
c/o Jason Gordon
March 3, 2023
Page 3 of 42

- “And if you have a number 2, this guy was the incoming COO of this Fortune 500 company, running this type of smear campaign, this is not somebody who you want running a 15 billion dollar a year revenue company. I mean how does somebody like this have time to do something like this when they’re responsible for so much across this fortune 500 company? It just doesn’t make sense.”
- “OK, how did this guy have this much time to do this kind of stuff on company time, (allegedly, we have very good proof), and potentially on company devices and company equipment? And this is a problem.”
- “It’s another thing to invest in a Fortune 500 company and have an executive be running something like this and I think that’s what’s so shocking about this.... It’s behavior that shouldn’t be happening in a fortune 500 company.”
- “All these wild allegations, looks like they’re pretty darn true.”
- “This was calculated, very malicious.... You very rarely see a well-compensated fortune 500 executive use that brain power to conceal his identity and discuss the company by which he is senior executive of.... When you go to sell stock, or you go to discuss stock ... when you go to discuss a public security that you’re affiliated with and you’re a senior executive with information that the public is unaware of, you cannot be using that position to put out information as long as you’re not disclosing that to all investors and there are investor relations departments ... information that only somebody on the inside would know.... This is stuff that only somebody with access to board materials or to the CEO would know.”
- “This has been going on for years, we think.”
- “One of the things that he allegedly did was he was attacking people for not being able to qualify for a Pulte home. Not being able to purchase a Pulte home necessarily. And that’s also what we want to make sure that executives aren’t making fun of people for their financial status.”
- “In fact, I just started Pulte Files this last week to expose these different bots that were using dead people’s identities to attack me and my family”
- “No bot farms, no multiple fake identities, don’t steal from dead people’s identities, start attacking me and my dead grandpa maliciously.”



Bill Pulte
c/o Jason Gordon
March 3, 2023
Page 4 of 42

On or about December 28, 2022, you made an appearance on Bloomberg TV.⁴ During this appearance, you made the following comments conveying a false and defamatory meaning:

... That's kind of why I've been tough on our legacy family business, Pulte Homes, recently; they had a rogue executive doing some nonsense.... There were at least, as far as we know, 6 or 7 different bots ... that were attacking me and my family being operated by my the number 2 in this Fortune 500 company. We can't have this kind of nonsense in a publicly traded company. We can't have this kind of nonsense in a Fortune 500 company.... It's hard for people to understand that somebody could be number 2 in a Fortune 500 company doing this kind of stuff. I mean they are attacking my dead grandfather who founded this fortune 500 company.

On or about January 10, 2023, you made an appearance on the podcast Action and Ambition in an episode titled "Bill Pulte is Bringing Joy To the Internet By Helping People With Critical Needs and Terminal Illness."⁵ During this appearance, you made the following comments conveying a false and defamatory meaning:

Come to find out ... the gentlemen was running a series of sophisticated ... fictitious accounts to relentlessly attack my dead grandfather and I. He would use the identities of dead people for example. He would use AI generated faces and he would come up with crazy conspiracy theories, like my own father had burned down buildings.... This was not your average insult or troll; this was a very calculated, malicious thing I think it's been very hard for people to believe that a number 2 of a Fortune 500 company would be doing something like this.... You can't really have ... an executive screwing around and using time to basically harass the founding family, meaning me, my grandfather."

On or about January 12, 2023, you made an appearance on Fox Business.⁶ During this appearance, you made the following comments conveying a false and defamatory meaning:

He stole the identity from a dead guy, posing as a dead guy to attack me, attack my father, grandfather...Fortunately PulteGroup ultimately did the right thing ... we need to make sure this kind of stuff isn't going on at a Fortune 500 company.... But this type of shenanigans should not be going on at a publicly traded company where they're operating these fake bot networks, these fake accounts, to attack us, conceivably in my opinion to probably make sure that ... their job is safe. Ironically, this actually jeopardized his job by carrying out this crazy attack against us on Twitter.... Frankly we just want to run this down and make sure nothing more

⁴ See <https://www.youtube.com/watch?v=RLYjjOPOXc8>.

⁵ See <https://www.entrepreneur.com/listen/action-and-ambition/442582>.

⁶ See <https://video.foxbusiness.com/v/6318556052112#sp=show-clips>.



Bill Pulte
c/o Jason Gordon
March 3, 2023
Page 5 of 42

nefarious is going on. I mean it does beg the question, how is this guy on company time running all of these fake accounts? [T]hese accounts, they start attacking me and putting the stock ticker in. I don't even know how this stuff is legal, it may be illegal. I don't know.... You cannot be doing this kind of nonsense and be running a 15 billion dollar company. You just can't do it.

On or about February 1, 2023, you made another appearance on Fox Business.⁷ During this appearance, you made the following comments conveying a false and defamatory meaning:

You know what happened with PulteGroup where this one executive was harassing me. You know, we need to make sure that these management teams are completely focused on executing right now.... We talked a little bit about the twitter bot harassment campaign that a gentleman who was the COO, incoming COO, of PulteGroup was levying against our family. We've collected additional evidence, we continue to collect evidence. The Board said that the investigation was complete. Frankly, it's totally incomplete because I was the victim of this harassment. I think there is potential violation of criminal statutes here. So we hope they do the right thing.... This is just maybe one or two or three executives that we have to make sure aren't doing this kind of shenanigans.

II. Your Statements to Print Media

On or about December 14, 2022, you participated in coverage of your lawsuit by the Detroit Free Press,⁸ during which you made the following comments conveying a false and defamatory meaning: "Nobody should be treated maliciously like this ... But to have a sophisticated bot network that's being run by a No. 2 at a Fortune 500 company is totally and completely inappropriate."

On or about December 14, 2022, you participated in coverage of your lawsuit by Bloomberg,⁹ during which you made the following comments conveying a false and defamatory meaning: "Jones brings scandal to Pulte Homes by running Twitter Bots to smear me, The Pulte Family, undisclosed tweets about \$PHM stock, and we have evidence of attacks against some of YOU. This ends today. #StopTheBots"

⁷ See <https://video.foxbusiness.com/v/6319595668112#sp=show-clips>.

⁸ See <https://www.freep.com/story/money/business/2022/12/14/pulte-grandson-sues-pultegroup-exec-twitter-trolling/69728089007/>. Again, like your on air media interviews, you republished this article and all or virtually all other articles mentioned herein to your Twitter page in a fashion that will receive no privilege, and are thus liable for the defamatory statements made within the article as well and as addressed below.

⁹ See <https://www.bloomberg.com/news/articles/2022-12-14/homebuilding-heir-alleges-new-coo-is-behind-twitter-bot-attacks>.



Bill Pulte
c/o Jason Gordon
March 3, 2023
Page 6 of 42

On or about December 16, 2022, you participated in coverage of your lawsuit by the Atlanta Journal Constitution,¹⁰ during which you made the following comments conveying a false and defamatory meaning:

- “William J. Pulte ... said he had informed the board of directors on Monday that Jones had been carrying out an online campaign—mainly on Twitter—using stolen identities and aliases to accuse Pulte and his family of arson, elder abuse and violations of securities laws.”
- “Pulte said Jones committed many of these actions while at work and while using company computers. He asked for an investigation by the Securities and Exchange Commission as to whether regulations or laws have been broken.”

III. Your Press Releases

On or about December 14, 2022, you issued a press release to accompany the filing of your lawsuit.¹¹ This press release contains the following statements conveying a false and defamatory meaning:

- The headline, “Pulte Family Alleges Incoming COO of PulteGroup Used Twitter Based Bot Network to Target Pulte Family”
- “The Pulte Family has called for an independent investigation firewalled off from executives to assess the extent to which company and shareholder resources were used in Jones’ alleged illicit behavior. The more than 100-page complaint alleges that Jones used a variety of fake Twitter profiles to harass Pulte and his followers. These fake profiles included appropriating the full identity of a deceased man, ‘Raymond Porter’ of Olive Hill, Kentucky, who passed away on October 28, 2018, AI-generated profiles of males and females, posing as fictitious business journalist covering PulteGroup . . . The Raymond Hutchinson account is part of a fabricated network weaponized against Bill Pulte and other members of the Pulte family. Jones oversees thousands of subordinates but found himself in violation of PulteGroup’s Code of Conduct, the employee handbook, when using his accounts to allegedly engage with illicit pornography accounts. In other instances, Jones made representations about employee layoffs, past and future performance, and what is believed to be internal board conversations he was not a party to, in violation of both PulteGroup and SEC guidelines. In one instance, Jones used his bot network to contact the Detroit News and the Detroit Free Press to falsely publish that Pulte was accusing his own father of

¹⁰ See <https://www.ajc.com/news/atlanta-news/pulte-group-exec-fired-after-founders-grandson-alleges-online-attacks/RSQ4UN6TDFB3LOR3MP7NRGTEJE/>.

¹¹ See <https://www.prnewswire.com/news-releases/pulte-family-alleges-incoming-coo-of-pultegroup-used-twitter--based-bot-network-to-target-pulte-family-301703394.html>.



Bill Pulte
c/o Jason Gordon
March 3, 2023
Page 7 of 42

burning down his country club.... [W]e have asked the independent board members of PulteGroup ... to determine if any crimes were committed by Brandon Jones, including his undisclosed promotion of PulteGroup stock and information that may have been confidential..."

- "The end goal of the Pulte Family's lawsuit against this senior executive, amongst other claims, is to rid any cancerous actions that could jeopardize the future of the Pulte Homes [sic] and the company's amazing employees."

On or about December 16, 2022, you issued a press release, again via PR Newswire.¹² This press release contains the following statements conveying a false and defamatory meaning:

Today, the Board of Directors took a necessary, first step in limiting any future legal liability in acknowledging the defamatory Bot Network ran on Company time by Brandon Jones.... Now that the preliminary investigation ... determined that the Bot Attacks were covertly operated by Brandon Jones, The Pulte Family expects the Board of Directors ... to conduct an independent investigation to determine if any SEC regulations, federal law, and other company policies were broken.... While management is threatening layoffs and failing to diversify the management team, Jones, as a member of management, has found time to run secret Twitter accounts whilst enforcing PulteGroup social media policies on employees at the same time.... On December 14, 2022, the Pulte Family filed a civil complaint against Brandon Jones, for allegedly tortiously interfering, stalking, harassing, and defaming the company's founder, William J. Pulte (1932-2018), his grandson Bill Pulte, and his family through Jones' creations of a sophisticated network of Twitter bots.

On or about December 19, 2022, you issued another press release, again via PR Newswire.¹³ This press release contains the following statements conveying a false and defamatory meaning: "I was shocked and saddened to read about the harassment and smear campaign launched against my nephew Bill Pulte, my Father and members of my family.... PulteGroup did take action this week and fired the COO, Brandon Jones, who was accused of harassing and defaming my father and nephew."

IV. Your Website

¹² See <https://www.prnewswire.com/news-releases/bill-pulte-issues-statement-on-termination-of-pultegroup-coo-brandon-jones-301705412.html>.

¹³ See <https://www.prnewswire.com/news-releases/eldest-son-of-pultegroup-founder-william-j-pulte-issues-statement-on-controversial-management-at-pultegroup-and-lawsuit-301706154.html>. Although this press release purports to be from your uncle, we reasonably believe that you approved the same for publication.



Bill Pulte
c/o Jason Gordon
March 3, 2023
Page 8 of 42

Contemporaneously with filing your lawsuit, you also launched a website wherein you identify certain of your central false and defamatory claims and otherwise sensationalize your claims. See <https://pultelawsuit.com/>. Like your media interviews and the articles identified herein, you have obsessively publicized this website on your Twitter page. Apparently concerned that the publication of your complaint on this website would not receive the benefit of an absolute litigation privilege, your website includes a disclaimer that the “statements on this website are opinions and allegations sources from a legal complaint” and that your readers “should do their own diligence.” Nonetheless, your website leads with five false and defamatory claims:

- “1) Fortune 500 Pulte Groups Incoming COO Brandon Jones Running Bot Network”
- “2) Stalking, harassing, and defaming The Pultes as part of nefarious smear campaign”
- “3) Stole the identity of a deceased man to conceal his identity”
- “4) Weaponized fabricated bot network to give the fake impression of engagement”
- “5) Board needs indep. investigation to prevent Jones doing irreparable harm to the company & Pulte’s ...”

Following these statements, you publish and encourage readers to read your complaint, which itself contains (among many others) the following allegations conveying a false and defamatory meaning in paragraphs 14, 28, 29, 30, 31-34, 36-45, 47, 48, 50-52, and 55:

- “14. ... Jones ... was ... not qualified for the position proposed [COO].”
- “29. Upon information and belief, Jones has created a sophisticated network of fictitious accounts (“bots”, the “botnet”, or “bot network”) to target, publish and artificially amplify incessant, targeted, coordinated and malicious harassment attacks on Pulte, his grandfather and The Pulte Family.”
- “28. Upon information and belief, PulteGroup Inc. resources were used in the commission of this tort.”
- “30. To conceal his identity and actions, Jones uses and frequently changes fake names for his bots. In at least one case, Jones appears to have stolen the identity or photograph of a deceased man to conceal Jones’s own identity. It appears that Jones is using PulteGroup-paid-time and PulteGroup-paid property to operate his botnet. It is likely that Jones is using PulteGroup-controlled IT-issued devices to operate the botnet.”
- “32. Consequences dictate termination according to the Code of Ethical Business Conduct and standard operating procedures currently in place at PulteGroup Inc. This



Bill Pulte
c/o Jason Gordon
March 3, 2023
Page 9 of 42

is why Jones sought to conceal his identity as he evaded PulteGroup's legal compliance, Human Resources oversight, and Investor Relations Department."

- "33. PulteGroup's Code of Ethical Business Conduct prohibits the behavior Jones exhibited in dozens of replies and malicious tweets directed at Pulte and his family. Shockingly, he violated nearly every point envisioned by PulteGroup:
 - Disrespectful, unprofessional, unethical comments.
 - Offensive material, such as pornography, sexually suggestive content, racial slurs, offensive language or jokes in the workplace, posted/shared on social media, or expressed to or about members of the Pulte community, including customers, employees, or trades.
 - Derogatory comments regarding another person, such as that person's age, sexual orientation, religious or political beliefs, national origin, disability or any other protected classification in the workplace, posted/shared on social media, or expressed to or about members of the Pulte community, including customers, employees, or trades.
 - False, misleading, deceptive, derogatory or disparaging statements about any third parties, including competitors (there is no reason to ever discuss a competitor on social media site).
 - Usage that is inconsistent with the policies in the Code of Conduct or employee handbook.
 - Communications prohibited by law or designed to encourage illegal or improper behavior.

See pp. 26-28 of PulteGroup's Code of Ethical Business Conduct a copy of which is attached hereto as Exhibit 'N'."

- "36. Jones is targeting Pulte with his false, defamatory and harassing Twitter posts ... under at least five different names including stealing the identity or photo of a deceased man."
- "37. His bot network's behavior includes constant and repetitive attacks on the Pulte family, accusing members of the Pulte family of crimes, specifically arson, elder abuse and securities laws violations that they did not commit, following illicit pornography, and personally insulting Pulte's Twitter followers. As stated above, PulteGroup's Code of Ethic Business Conduct prohibits regular engagement Jones exhibited with 'pornography, sexually suggestive content.' *See p. 27 of Exhibit 'N'.*"
- "38. Often, Jones's insults are made with non-public, confidential information from PulteGroup Inc."



Bill Pulte
c/o Jason Gordon
March 3, 2023
Page 10 of 42

-
- “39. Jones uses his fake identities to evade disclosure required by both PulteGroup Inc.’s Employee Handbook and the Securities and Exchange Commission (‘SEC’).”
 - “40. Jones’s activities function as a pseudo Investor Relations Department for PulteGroup Inc., which is another violation of PulteGroup’s Code of Conduct, assuming Jones’ bots were not authorized to make such statements on behalf of the Company.”
 - “41. Jones’s bots wait for posts from Pulte and then the bots jump into the public comment to plant falsehoods, make statements that either are not true or rely on confidential, nonpublic information and/or disparage Plaintiff’s reputation. To avoid detection, and after hurling insults at Pulte and his fans, Jones will often delete his bot’s public tweets. Jones’s tactics are calculated, malicious, defamatory and unlawful.”
 - “42. Upon information and belief, Jones has been internet stalking, defaming, and harassing Pulte on Twitter, and possibly several other websites, since at least 2021.”
 - “43.... The primary reason for repurposing of this Twitter account became targeting, internet harassment and interfering with ongoing social conversations of Pulte.”
 - “44. On or about February 12, 2022, the display name of the ‘@GoDetroitWin’ Twitter account was again changed, this time to a fake name ‘Raymond Hutchinson’ with a profile picture stolen from an elderly man. According to an online obituary, this elderly man’s real identity is ‘Raymond Porter’ of Olive Hill, Kentucky who passed away on October 28, 2018. The account has been improperly appropriated to misrepresent who is the owner of the account.... It is likely that this identity was unlawfully taken by Jones without permission of Mr. Raymond Porter’s family.”
 - “45. On or about May 12, 2022, Jones changed ‘Raymond Hutchinson’ on the ‘@GoDetroitWin’ Twitter account to a new fake identity, ‘Douglas A. Baldwin’, with a profile picture of a young adult male – who is not Jones – in his late 20’s to 30’s. It is unclear if this person is a sophisticated ‘deep fake’ image or if this is another case of identity theft by Jones.”
 - “47.... It is unclear if this person is a sophisticated ‘deep fake’ image or if this is another case of identity theft by Jones.”
 - “48.... A gentleman who is not Jones is pictured in the profile’s picture to deliberately mislead Pulte’s followers and the investment community into thinking this person is a



Bill Pulte
c/o Jason Gordon
March 3, 2023
Page 11 of 42

serious business journalist. . . . It is unclear if the person in the profile photo is a sophisticated ‘deep fake’ image or if this is another case of identity theft.”

- “50. Jones’s use of multiple personal accounts violates several of Twitter’s Terms of Service parameters, including but not limited to ‘abuse/harassment,’ ‘hateful content,’ manufactured conversations, and posting from multiple accounts.”
- “51. Specifically, Twitter prohibits the practice Jones has and continues to use to defame and harass Pulte, namely ‘creating multiple accounts to post duplicative content or create fake engagement, including: posting identical or substantially similar tweets or hashtags from multiple accounts you operate.’ *See* Twitter’s Terms of Service attached hereto as Exhibit ‘B’.”
- “52. Jones’s Twitter accounts frequently comment on Pulte’s Twitter posts and have embarked on a vindictive campaign of falsehoods as a means to sully Pulte’s good name and the charitable work in which he engages. Jones’s bots have published during business hours when Jones should be focused on the work of Pulte Homes – not disparaging a former Board member, and indirectly, Pulte Homes for whom Jones works.”
- “55.... As a former board member, Pulte believes Jones received private board information that was then used to publish false and partial misinformation.”

V. Your Social Media Accounts

Primarily through your individual Twitter account, @pulte, but also through an account that we understand you administer, @realPulteFamily, you have published dozens of false and defamatory tweets, as well as adopted certain defamatory statements in various media articles, media interviews, and on your website.¹⁴

On December 14, 2022, you published a series of tweets containing statements which convey a false and defamatory meaning, as follows:¹⁵

¹⁴ Because you republished the content of your website on Twitter on numerous occasions, we request that a retraction be made both on the website and on your Twitter of the particular accusations listed above as being false and defamatory in the complaint.

¹⁵ *See* <https://twitter.com/pulte/status/1603090696872890369>; <https://twitter.com/pulte/status/1603165978057113602>; <https://twitter.com/pulte/status/1603187073447768065>.



Bill Pulte
c/o Jason Gordon
March 3, 2023
Page 12 of 42



BOTS aren't just manipulating our Political Discourse in Public Square, they're also manipulating Wall Street Markets, and Main Street 401Ks. Will you help us #StopTheBots? "Brandon Jones."

7:35 PM · Dec 14, 2022

324 Retweets 18 Quote Tweets 2,639 Likes

Included within your 1:13 p.m. tweet is a false and defamatory Bloomberg.com article containing the following false and defamatory statements, which you adopted:

- The headline "Bill Pulte ... says PulteGroup's incoming chief operating office used bots for harassment."
- "A feud between PulteGroup Inc.'s founding family and a top executive at the homebuilder has spilled out in public with a lawsuit accusing the company's incoming chief operating officer of orchestrating a smear campaign."



Bill Pulte
c/o Jason Gordon
March 3, 2023
Page 13 of 42

- “Bill Pulte ... alleged in a civil complaint filed Wednesday in Palm Beach County, Florida, that newly named PulteGroup COO Brandon Jones has used a network of Twitter bots to harass and defame the family.”
- “Pulte, 34, alleges that Jones appropriated the identity of a dead person, impersonated a business journalist and used Twitter to contract Detroit newspapers in service of his campaign.”

On December 15, 2022, you published the following tweet¹⁶ conveying a false and defamatory meaning, and otherwise adopted the statements listed in the CNBC interview above, all of which must be retracted:



On December 16, 2022, you published a series of tweets containing statements which convey a false and defamatory meaning, as follows:¹⁷

¹⁶ See <https://twitter.com/pulte/status/1603566980753235968>.

¹⁷ See <https://twitter.com/pulte/status/1603779700756815875>;
<https://twitter.com/pulte/status/1603824730657652742>;
<https://twitter.com/pulte/status/1603889116776730625>.



Bill Pulte
c/o Jason Gordon
March 3, 2023
Page 14 of 42



Pulte ✓
@pulte

Letter to CEO Ryan Marshall [@ryamarsh](#):

Brandon Jones fired over defamatory Twitter Bots

1. Do not punish Employees or their social media.
2. Management must have same rules as them.
3. Waiting for apology. Independent investigation now that internal probe is done?

[\\$PHM](#)

10:50 AM · Dec 16, 2022 · 1.9M Views

1,001 Retweets 19 Quote Tweets 6,233 Likes



Pulte ✓
@pulte

FIRST VICTORY: Fortune 500 PulteGroup COO terminated after running Twitter Bots to Attack the Pulte Family 🇺🇸

are you with me? hang on



freep.com

PulteGroup's incoming COO fired after Bill Pulte Twitter trolling claims
The firing comes in the wake of a lawsuit from Twitter philanthropist Bill Pulte that the firm's incoming COO harassed and trolled him and his family.

1:49 PM · Dec 16, 2022 · 179.5K Views

275 Retweets 12 Quote Tweets 2,583 Likes



Pulte ✓
@pulte

ex-COO Brandon Jones flashy attorney calls [@PulteHomes](#) Board's FIRING Jones a falsehood? Will Jones SUE Pulte Homes for wrongful termination? Or apologize for defaming me with Twitter Bots? Did he break laws? Tick Tock

Exhibits are literally in the suit.

[PulteLawsuit.com](#)

“The lawsuit contains many falsehoods and inaccuracies, chief among them the provably false allegation that Mr. Jones is using or has ever used ‘bots’ or ‘bot networks,’” an attorney for Jones said in an emailed statement.
“Unfortunately, Bill Pulte’s far-fetched claims have had their desired effect, causing Mr. Jones’ termination from the job that he loved.”

6:05 PM · Dec 16, 2022 · 112.4K Views

117 Retweets 1 Quote Tweet 1,198 Likes





Bill Pulte
c/o Jason Gordon
March 3, 2023
Page 15 of 42

Included within your 1:49 p.m. tweet is a false and defamatory freep.com article containing the following false and defamatory statements, which you adopted:

- “the lawsuit accused Jones of holding a grudge against the younger Pulte and using several fake identities on Twitter to harass and troll him and other Pulte family members.”
- “Pulte’s lawsuit claims that Jones used several alter ego Twitter accounts under fake names to harass and defame him...”
- “... although the suit claimed that Jones used company time and possibly company equipment to carry out the alleged Twitter campaign, which could violate the company’s ethics code.”

On December 19, 2022, you published the following tweet¹⁸ conveying a false and defamatory meaning:



On December 20, 2022, you published the following tweet¹⁹ conveying a false and defamatory meaning:

¹⁸ See <https://twitter.com/pulte/status/1604958463343611904>.

¹⁹ See <https://twitter.com/pulte/status/1605181836455710720>.



Bill Pulte
c/o Jason Gordon
March 3, 2023
Page 16 of 42



On December 21, 2022, you published a series of tweets containing statements which convey a false and defamatory meaning, as follows:²⁰



²⁰

See

<https://twitter.com/pulte/status/1605586768279085056>;

<https://twitter.com/pulte/status/1605611430350184455>;

<https://twitter.com/pulte/status/1605612207785381901>;

<https://twitter.com/pulte/status/1605612355735261185>;

<https://twitter.com/pulte/status/1605612504872153088>;

<https://twitter.com/pulte/status/1605722383175729153>;

<https://twitter.com/pulte/status/1605609966433230852>.



Bill Pulte
c/o Jason Gordon
March 3, 2023
Page 17 of 42



This was another image PulteGroup COO Jones allegedly misappropriated from the Detroit Tigers (trademark emoji). Do you think the Detroit Tigers gave him permission to hide his identity to harass me, grandpa, and my family? PulteGroup Handbook violation. @tigers



12:12 PM · Dec 21, 2022 · 75.5K Views



This appears to be a woman in her 20's or 30's. We believe this may be an AI generated face used to conceal Mr. Jones identity, but we need to make sure it is not another case of identity theft. Can you find the truth for Diana and I?



12:13 PM · Dec 21, 2022 · 87.5K Views



Douglas A Baldwin is also likely a fake name and identity. Can anyone find this man's photo elsewhere or was this sophisticated A.I. used by @PulteHomes COO Brandon Jones used to harass My Pulte Family?



12:13 PM · Dec 21, 2022 · 89.9K Views



Replying to @Caitlinbaby125 @EverythingTaket and 2 others

Any/Every Firm or Group running Fictitious Bots to affect the Stock Price should go to JAIL!

7:30 PM · Dec 21, 2022 · 2,876 Views

12 Retweets 118 Likes





Bill Pulte
c/o Jason Gordon
March 3, 2023
Page 18 of 42



On December 22, 2022, you published the following tweet²¹ conveying a false and defamatory meaning:



On December 25, 2022, you published the following tweet²² conveying a false and defamatory meaning:

²¹ See <https://twitter.com/pulte/status/1605925162645348358>.

²² See <https://twitter.com/pulte/status/1607167570410635275>.



Bill Pulte
c/o Jason Gordon
March 3, 2023
Page 19 of 42



On December 26, 2022, you published the following tweet²³ conveying a false and defamatory meaning:

²³ See <https://twitter.com/pulte/status/1607442784390094859>.



Bill Pulte
c/o Jason Gordon
March 3, 2023
Page 20 of 42



On December 27, 2022, you published a series of tweets containing statements which convey a false and defamatory meaning, as follows:²⁴

24

See <https://twitter.com/pulte/status/1607741530499911686>;
<https://twitter.com/pulte/status/1607789122063826945>;
<https://twitter.com/pulte/status/1607795668512550912>;
<https://twitter.com/pulte/status/1607868918319702017>.



Bill Pulte
c/o Jason Gordon
March 3, 2023
Page 21 of 42



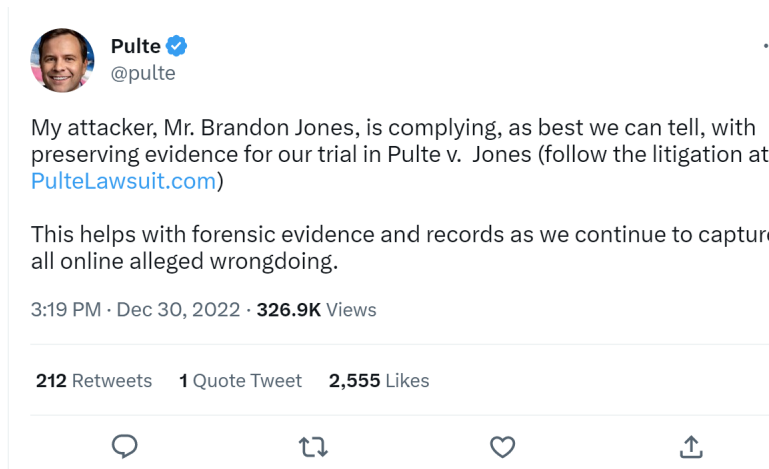


Bill Pulte
c/o Jason Gordon
March 3, 2023
Page 22 of 42

On December 28, 2022, you published the following tweet²⁵ conveying a false and defamatory meaning:



On December 30, 2022, you published the following tweet²⁶ conveying a false and defamatory meaning:



²⁵ See <https://twitter.com/pulte/status/1608261485867958274>.

²⁶ See <https://twitter.com/pulte/status/1608920648784678912>.



Bill Pulte
c/o Jason Gordon
March 3, 2023
Page 23 of 42

On January 1, 2023, you published the following tweet²⁷ conveying a false and defamatory meaning:



On January 5, 2023, you published a series of tweets containing statements which convey a false and defamatory meaning, as follows:²⁸



²⁷ See <https://twitter.com/pulte/status/1609626629441212416>.

²⁸ See <https://twitter.com/pulte/status/1611085092566229000>; <https://twitter.com/pulte/status/1611085311194325006>; <https://twitter.com/pulte/status/1611102248246956033>.



Bill Pulte
c/o Jason Gordon
March 3, 2023
Page 24 of 42

On January 10, 2023, you published the following tweets²⁹ conveying a false and defamatory meaning:



On January 12, 2023, you published the following tweets³⁰ conveying a false and defamatory meaning:

²⁹ See <https://twitter.com/pulte/status/1612855385815240704>; <https://twitter.com/pulte/status/1612948985685184513>.

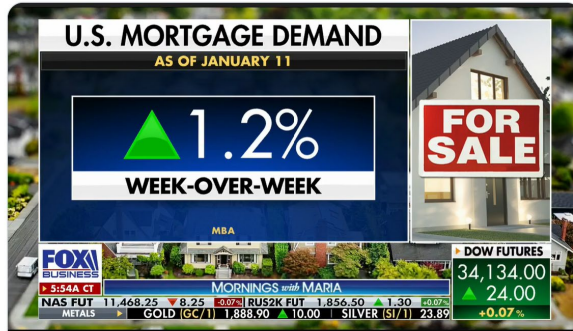
³⁰ See <https://twitter.com/pulte/status/1613580112137523202>; <https://twitter.com/pulte/status/1613666997392527372>.



Bill Pulte
c/o Jason Gordon
March 3, 2023
Page 25 of 42



MORNING! We talked housing and gave a Pulte Capital forecast with the best in the business, @MariaBartiromo!



video.foxbusiness.com

US real estate earnings will 'continue to deteriorate': Bill Pulte
Pulte Capital CEO Bill Pulte predicts a U.S. recession and a 'big problem' in housing with mortgage and interest rates.

11:54 AM · Jan 12, 2023 · 101.2K Views

129 Retweets 3 Quote Tweets 1,602 Likes



We always fight for what's right. For You, Family, and Business! That's why we had to hold Top "PulteGroup" Executive accountable for harassing me and my grandpa with Fake Twitter Accounts. Now, examining Mr. Sheldon's suspicious deactivation.

cc: @MariaBartiromo



5:39 PM · Jan 12, 2023 · 146.3K Views

177 Retweets 10 Quote Tweets 1,787 Likes

On January 14, 2023, you published the following tweets³¹ conveying a false and defamatory meaning:



I want to thank my wife, Diana, for bringing our new son into the world.

During her pregnancy, she had to endure constant stalking and harassment of Our Family from Top "PulteGroup" Executive(s).

Now, we need to determine what Executive Mr. Todd Sheldon did with his account.



6:33 PM · Jan 14, 2023 · 209.5K Views

210 Retweets 11 Quote Tweets 2,809 Likes



Thanks to @MariaBartiromo for asking the right questions. This kind of harassment cannot be going on inside companies, especially by Fortune 500 executive(s). And also because it hurts the beloved employees.
\$PHM

6:35 PM · Jan 14, 2023 · 101.4K Views

66 Retweets 2 Quote Tweets 716 Likes



31

See

<https://twitter.com/pulte/status/1614405276400066560>;
<https://twitter.com/pulte/status/1614405824495104001>.



Bill Pulte
c/o Jason Gordon
March 3, 2023
Page 26 of 42

On January 16, 2023, you published the following tweets³² conveying a false and defamatory meaning:



On January 17, 2023, you published the following tweets³³ conveying a false and defamatory meaning:



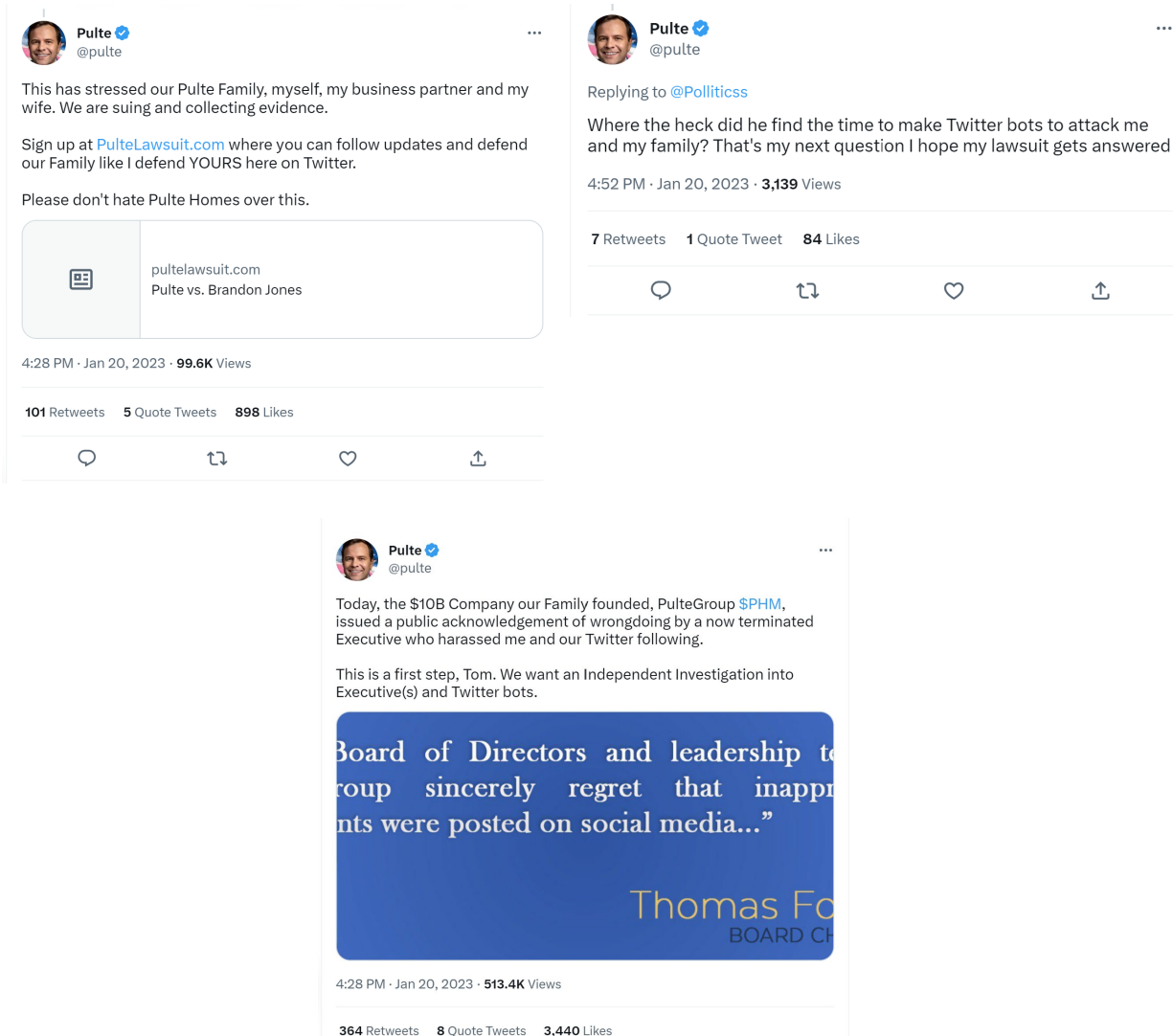
³² See <https://twitter.com/pulte/status/1615061758078554137>; <https://twitter.com/pulte/status/1615137994285146114>.

³³ See <https://twitter.com/pulte/status/1615513471109455878>; <https://twitter.com/pulte/status/1615513896349233153>.



Bill Pulte
c/o Jason Gordon
March 3, 2023
Page 27 of 42

On January 20, 2023, you published the following tweets³⁴ conveying a false and defamatory meaning:



On January 21, 2023, you published the following tweets³⁵ conveying a false and defamatory meaning:

³⁴ See <https://twitter.com/pulte/status/1616548212143230977>; <https://twitter.com/pulte/status/1616554205531066384>; <https://twitter.com/pulte/status/1616548205172514816>.

³⁵ See <https://twitter.com/pulte/status/1616945054379040768>; <https://twitter.com/pulte/status/1616951342089621506>.



Bill Pulte
c/o Jason Gordon
March 3, 2023
Page 28 of 42



On January 22, 2023, you published the following tweets³⁶ conveying a false and defamatory meaning:



³⁶

See

<https://twitter.com/pulte/status/1617254731281498112>;
<https://twitter.com/pulte/status/1617304365207007234>.



Bill Pulte
c/o Jason Gordon
March 3, 2023
Page 29 of 42

On January 30, 2023, you published the following tweets³⁷ conveying a false and defamatory meaning:



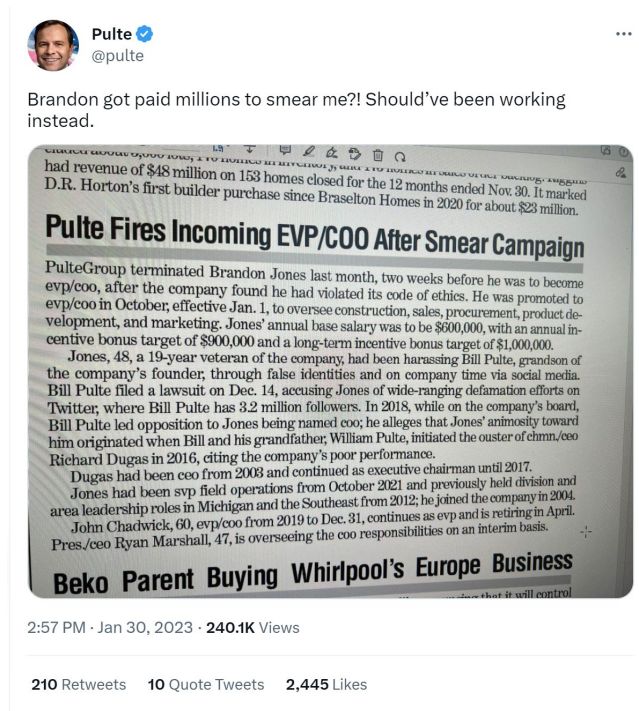
³⁷

See

<https://twitter.com/pulte/status/1620059471132368897>;;
<https://twitter.com/pulte/status/1620059477734199297>;
<https://twitter.com/pulte/status/1620149215577133057>.



Bill Pulte
c/o Jason Gordon
March 3, 2023
Page 30 of 42



On January 31, 2023, you published the following tweet³⁸ conveying a false and defamatory meaning:



On February 2, 2023, you published the following tweet³⁹ conveying a false and defamatory meaning:

³⁸ See <https://twitter.com/pulte/status/1620546801152708608>.

³⁹ See <https://twitter.com/pulte/status/1621124317236035584>.



Bill Pulte
c/o Jason Gordon
March 3, 2023
Page 31 of 42



On February 12, 2023, you published the following tweet⁴⁰ conveying a false and defamatory meaning:

⁴⁰ See <https://twitter.com/pulte/status/1624879487660720130>.



Bill Pulte
c/o Jason Gordon
March 3, 2023
Page 32 of 42



Pulte ✓
@pulte

You know how I'm suing that guy who Stalked my family? It just keeps getting deeper and deeper. If anyone has info (legal & clean), please submit to PulteLawsuit.com! Thank you for protecting my family!

4:13 PM · Feb 12, 2023 · 196.9K Views

143 Retweets 5 Quote Tweets 1,698 Likes



On February 13, 2023, you published the following tweet⁴¹ conveying a false and defamatory meaning:



41

See

<https://twitter.com/pulte/status/1625121264313458690>;

<https://twitter.com/pulte/status/1625190854808768523>;

<https://twitter.com/pulte/status/1625300911059787782>.



Bill Pulte
c/o Jason Gordon
March 3, 2023
Page 33 of 42



On February 15, 2023, you published the following tweet⁴² conveying a false and defamatory meaning:



On February 16, 2023, you published the following tweet⁴³ conveying a false and defamatory meaning:

⁴² See <https://twitter.com/pulte/status/1626010438512087040>.

⁴³ See <https://twitter.com/pulte/status/1626384474765246464>.



Bill Pulte
c/o Jason Gordon
March 3, 2023
Page 34 of 42



On February 17, 2023, you published the following tweet⁴⁴ conveying a false and defamatory meaning:



⁴⁴ See <https://twitter.com/pulte/status/1626683750552592384>.



Bill Pulte
c/o Jason Gordon
March 3, 2023
Page 35 of 42

On February 21, 2023, you published the following tweet⁴⁵ conveying a false and defamatory meaning:



On March 1, 2023, you published the following tweet⁴⁶ conveying a false and defamatory meaning:



On March 2, 2023, you published the following tweet⁴⁷ conveying a false and defamatory meaning:

⁴⁵ See <https://twitter.com/pulte/status/1628045462740643841>.

⁴⁶ See <https://twitter.com/pulte/status/1630991485268099084>.

⁴⁷ See <https://twitter.com/pulte/status/1631430121679626242>.



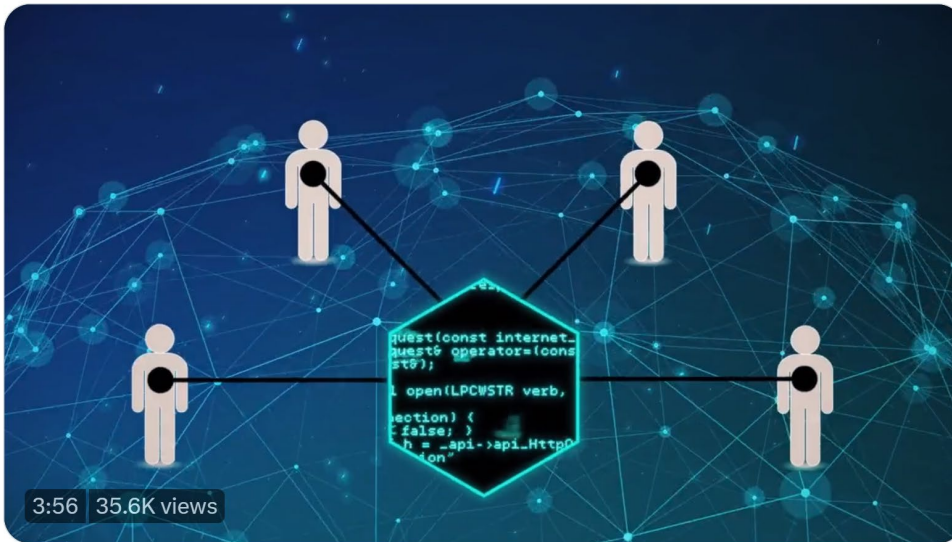
Bill Pulte
c/o Jason Gordon
March 3, 2023
Page 36 of 42



Pulte ✓
@pulte

...

Twitter Bots are bad ... but Brandon Jones' were even worse ... 📌



6:03 PM · Mar 2, 2023 · **140.7K** Views

251 Retweets **8** Quote Tweets **1,957** Likes



The Twitter post contains a video that conveys a false and defamatory meaning, including through the following false and defamatory statements:

- “[O]ne of the most skilled corporate influence in investor relations bot networks is secretly being operated by Brandon Jones, the former incoming COO of 10 billion plus dollars PulteGroup Incorporated, to target Bill Pulte, his grandpa, and the Pulte family.”
- “Brandon's bot network is using multiple bots with fake identities and profiles to engage with one another to make his corporate influence posts more popular than they actually are.”
- “The bots are retweeting and liking his fake accounts to boost fake engagement and use this bot network to create and boost hashtags.
- “Twitter calls this platform manipulation. One expert describes bot networks, ‘The ultimate goal of this disinformation is trying to influence real people.’”



Bill Pulte
c/o Jason Gordon
March 3, 2023
Page 37 of 42

- “Like other bot swarms, Brandon's bot network relies on at least one stolen identity, multiple faked identities and fake professions to trick actual people into thinking he is a real human being.”
- “In one case, one of Brandon's many bots pretended to be a business journalist from Seattle. In another, he stole the identity of a deceased man from Kentucky and appropriated his identity for one of these profiles that engaged in the harassment of certain Pulte family members and certain Twitter followers who support the family's charitable efforts.”
- “Forensic analysts have uncovered evidence that in order to evade detection, Brandon's bot network changed its individual profile identities many times over the course of several months in order to evade detection.”
- “Brandon's bots also scrubbed their posts after some time had passed and it's had the desired effect.”
- “The bot accounts comment on each other's posts to create a false narrative and give the impression that multiple people are engaging in a conversation in order to make the lies more believable.”
- “Lies, obsession, cyberstalking, harassment.”
- “Over the last several months, there have been hundreds and hundreds, maybe thousands of tweets produced by Brandon's bot network.”
- “Brandon's bot network, perhaps illegal for an insider executive of a Fortune 500 company, comments on the stock price and performance of Pulte Homes, a big no-no.”
- “Brandon shows an obsessive pattern with his tweets about Bill Pulte, his grandfather, and the Pulte family.”
- “On numerous occasions, the bots would tweet to Pulte's followers near simultaneously, often within seconds or minutes of each other, sometimes four to nine times, back to back, again and again.”
- “With these actions, Brandon violated Twitter's terms of service with his spoof accounts.”
- “The bots create false narratives to confuse and agitate Pulte's followers.”
- “The bots will get into arguments with followers who question their statements or even just post under Pulte's tweets.”



Bill Pulte
c/o Jason Gordon
March 3, 2023
Page 38 of 42

-
- “In every instance, it was not disclosed to the public that this is a publicly traded executive on the other end, potentially using non-public information to weaponize his bots.”
 - “On a recent occasion, Brandon's bots even went as far as insulting and humiliating a follower of Pulte's because of their lack of financial resources and their inability to afford a Pulte Home, which is his employer.”
 - “Brandon's intent appears clear, to marginalize Bill Pulte and concerned shareholders using manufactured or stolen identities in order to have fake conversations, bypassing corporate code of ethics, SEC norms and Twitter's own terms of service for the purposes of harassment and reputational harm.”
 - “Using multiple fake profiles, Brandon Jones manufactures negative concerns and harassed those whose opinions he did not like.”
 - “There's an ongoing investigation into Brandon and the origins of the access points for this bot network and its funding.”

In addition to retweets of each other's accounts and posts, on December 16, 2022, @realPulteFamily published the following unique tweets⁴⁸ conveying a false and defamatory meaning:

⁴⁸See <https://twitter.com/realPulteFamily/status/1603905441339154433>; <https://twitter.com/realPulteFamily/status/1603875550107402240>.



Bill Pulte
c/o Jason Gordon
March 3, 2023
Page 39 of 42



The AJC article adopted in the above tweet additionally contains the following statements conveying a false and defamatory meaning:

- “PulteGroup has fired one of its top executives after the grandson of the company’s founder charged him with creating online aliases and bots to attack him and the Pulte family.”
- “William J. Pulte ... said he had informed the board of directors on Monday that Jones had been carrying out an online campaign – mainly on Twitter – using stolen identities and aliases to accuse Pulte and his family of arson, elder abuse and violations of securities law.”
- “Jones – who was then running the company’s Michigan division – was not qualified for a top role, Pulte said.”
- “Pulte said Jones committed many of these actions while at work and while using company computers. He has asked for an investigation by the Securities and Exchange Commission as to whether regulations or laws have been broken.”



Bill Pulte
c/o Jason Gordon
March 3, 2023
Page 40 of 42



The Pulte Family
@realPulteFamily

BREAKING: Mentee of @PulteGroup CEO FIRED after internal (not independent) investigation found a very real Twitter Smear Campaign against @Pulte Family 🇺🇸 \$PHM



5:11 PM · Dec 16, 2022 · 37K Views

65 Retweets 4 Quote Tweets 389 Likes

The CNBC video adopted in the above tweet additionally contains the following statements conveying a false and defamatory meaning: “Pulte filing a lawsuit in recent days and alleging right here yesterday that Jones had orchestrated a smear campaign against him and his family on Twitter.”

There can be no doubt that you have on dozens of occasions falsely accused Mr. Jones of varied misconduct carrying with it the thrust that Mr. Jones engaged in multiple criminal and ethical violations, and acted in a dishonest and immoral manner, both professionally and personally. Given the number of occasions on which you have defamed Mr. Jones, we will be brief in describing both their individual and collective legal significance. Your accusations are not only false but are also defamatory per se, in that they both accuse Mr. Jones of criminal conduct and attack him in his profession, and thus the law will presume reputational and emotional damages even in the absence of tangible proof thereof. *See, e.g., O.C.G.A. § 51-5-4; Smith v. DiFrancesco*, 341 Ga. App. 786, 788 (2017) (“Libel per se consists of a charge that one is guilty of a crime, dishonesty or immorality. Statements that tend to injure one in his trade or business are also libelous per se.”); *Barnes v. O’Connell*, 300 Ga. App. 399, 400 (2009) (stating that the law “infers injury” where accusations are defamatory per se and upholding jury verdict even absence evidence of special damages). Additionally, given the context, your status on most occasions as a firsthand source, your explicit and implicit motivations, and your conscious failure to provide your readers



Bill Pulte
c/o Jason Gordon
March 3, 2023
Page 41 of 42

or viewers a fair and accurate factual basis for your accusations, we both expect Mr. Jones to defeat any applicable first amendment privilege or defense, as well as to hold you responsible for punitive damages. *Cf. Masson v. New Yorker Mag., Inc.*, 510 U.S. 496, 511-25 (1991) (holding that a defendant may have actual malice when it deliberately alters source quote which “alteration results in a material change in the meaning conveyed”); *Westmoreland v. CBS Inc.*, 596 F. Supp. 1170, 1176 (S.D.N.Y. 1984) (malice may be established when defendant “knowingly or recklessly misstates the evidence to make it seem more convincing or condemnatory than it is”); *Macon Tel. Pub. Co. v. Elliot*, 165 Ga. App. 719, 721 (1983) (affirming award of punitive damages where defendant’s accusations were actuated by actual malice); *Milkovich v. Lorain Journal Co.*, 497 U.S. 1, 18-19 (1990) (“If a speaker says, ‘In my opinion John Jones is a liar,’ he implies a knowledge of facts which lead to the conclusion that Jones told an untruth. Even if the speaker states the facts upon which he basis his opinion, if those facts are either incorrect or incomplete, or if his assessment of them is erroneous, the statement may still imply a false assertion of fact.”).

Accordingly, we hereby demand on Mr. Jones behalf that you issue a retraction of each of your statements identified in sections I. through V., above, in as conspicuous and public a manner as each was originally published. We further demand that you issue a retraction of all similar statements you have made in any forum. We additionally request that you take down⁴⁹ and remove any publication containing the accusations identified herein.

Finally, out of an abundance of caution, should you persist in this conduct despite this correspondence, this letter also serves as notice that you are hereby directed to preserve any and all evidence related in any way to your actions against our client and your statements identified herein. By this letter, you are directed not to destroy⁵⁰, conceal, or alter any paper or electronic files, physical evidence, and/or other data generated, relating in any way, no matter how remote, to your relationship with Mr. Jones and/or your publications regarding our client, including, but not limited to: (1) any and all documents and data referring to, reflecting, or relating to communications between you and any person regarding our client; (2) any and all documents and data referring to, reflecting, or relating to your purpose in publishing your accusations regarding our clients; (3) any and all documents and data referring to, reflecting, or relating to the number of likes, comments, interactions, or other engagements with your publications regarding our client; (4) any and all documents and data referring to, reflecting, or relating to any source for your accusations against our client and/or communications between you and any such source; and (5)

⁴⁹ Prior to doing so, you are obligated to preserve all relevant evidence, which likely includes, without limitation, all social media posts and all data associated with such posts, such as likes, views, comments, engagements, or other interactions. For instance, social media sites like Twitter provide the owner of the account access to data such as the above that is unavailable to another user, and those metrics may disappear and be non-recoverable in the event you delete a post without properly preserving the information prior to deletion.

⁵⁰ This preservation request notwithstanding, you are specifically authorized to take down and delete your social media posts at issue in this letter. Prior to doing so, as discussed above, please screenshot any available analytics for each individual post you made (such as the number of impressions, likes, replies, or other interactions).



Bill Pulte
c/o Jason Gordon
March 3, 2023
Page 42 of 42

any and all communications between you and any member of the media regarding our client, such as, without limitation, direct messages requesting or encouraging that others amplify your content regarding our client.

Many records and files are maintained electronically. This letter specifically requests that all paper and hard copy originals be maintained and preserved in their original format. By the same token, electronic documents and the storage media on which they reside—emails, texts, voicemails, phones, computers, social media messaging etc.—contain relevant, discoverable information beyond that which may be found in printed documents. Therefore, even where a paper copy exists and has been preserved, please preserve and maintain all electronically stored documents and information in their original native format. This preservation demand specifically encompasses any and all electronic documents, including but not limited to, all word-processed files, e-mails, text messages, spreadsheets, all databases, and any other electronically stored and/or generated documents or files.

* * *

This letter does not constitute an exhaustive statement of our client's claims, contentions, rights, and/or remedies, all of which are hereby expressly reserved.

Sincerely,

A handwritten signature in blue ink, which appears to be "Jonathan D. Grunberg", is written over a horizontal line.

Jonathan D. Grunberg

cc: Client
G. Taylor Wilson, Esq.
Nicole Jennings Wade, Esq.